

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

LATESSA SALONE,)	
JANET DEMARINIS,)	
ANDREA RAILA,)	
PAT QUINN, and)	
The petitioner signers of)	
The CUSTOMER UTILITY)	
CONVENTION)	No. 01-0321
)	
Petitioners)	
)	
Petition to the Members of the Illinois)	
Commerce Commission Pursuant to)	
Section 5-145(b) of the Illinois)	
Administrative Procedure Act)	

**AMEREN’S RESPONSE TO THE MOTION TO
DISMISS OF PEOPLES GAS AND NORTH SHORE**

COME NOW Central Illinois Public Service Company d/b/a AmerenCIPS (“AmerenCIPS”) and Union Electric Company d/b/a AmerenUE (“AmerenUE”) (jointly referred to herein as “Ameren”), by counsel, and in response to the Motion to Dismiss for Want of Prosecution, Motion for a Briefing Schedule and Motion for a Continuance filed by The Peoples Gas Light and Coke Company (“Peoples Gas”) and North Shore Gas Company (“North Shore”) in this proceeding on August 16, 2001, state as follows:

Ameren fully supports the Motion to Dismiss for Want of Prosecution filed by Peoples Gas and North Shore. The Petitioners in this proceeding have repeatedly failed to respond to motions to dismiss filed by several other parties to this proceeding, ignoring schedules established by the Administrative Law Judges on two occasions for such responses. In addition to the motions to dismiss cited by Peoples Gas and North Shore, Ameren’s motion to dismiss this proceeding has been pending since May 25, 2001, and

the Petitioners have made absolutely no effort to respond to it. Under these circumstances, there is no question that the Commission should promptly issue an order dismissing the Petition in this proceeding due to the Petitioners' failure to prosecute, as Peoples Gas and North Shore have requested.

Respectfully submitted,

Central Illinois Public Service Company
d/b/a AmerenCIPS and Union Electric Company
d/b/a AmerenUE

By_____

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Dated: August 31, 2001

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Response to the Motion to Dismiss filed by Peoples Gas and North Shore was placed in the United States Mail, first class, postage prepaid, and addressed to each person designated on the attached official service list compiled by the Secretary in this proceeding, and that it was served electronically to each person who has provided an e-mail address this 31st day of August 2001.

Thomas M. Byrne